

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

Deutsche Bank National Trust Company,  
as trustee for the registered holders of  
Morgan Stanley ABS Capital I Inc. Trust  
2007-NC3 Mortgage Pass-Through  
Certificates, Series 2007-NC3

Plaintiff

v.

Scott T. Carlone and Joan M. Carlone  
Defendants

1:17-CV-586

**OBJECTIO TO MOTION TO EXTEND TIME**

Now comes the Plaintiff, Deutsche Bank National Trust Company, as trustee for the registered holders of Morgan Stanley ABS Capital I Inc. Trust 2007-NC3 Mortgage Pass-Through Certificates, Series 2007-NC3, in the above captioned matter, and hereby objects to Defendant, Joan M. Carlone's motion to Extend Time to file an answer or otherwise plead.

The Summons and Complaint were served on Joan M. Carlone on December 22, 2017. As such, her Answer to the Complaint was due on or before January 12, 2018. Counsel filed an appearance on January 29, 2018 and now seeks an extension of time to file a late answer with any cause shown.

Pursuant to Rule 6(b)(2) of the Rules of Civil Procedure, if the motion is made after the time has expired, the moving party need demonstrate excusable neglect. No such showing was demonstrated by the Defendant. In addition, the time requested by the Defendant is excessive in that she seeks an additional 30 days to Answer.

WHEREFORE, Plaintiff prays that the Court deny Defendant's Motion to Extend time or in the alternative, limit any extension of time to ten (10) days together with such other and further relief as this Honorable Court deems meet and just.

Plaintiff  
By its attorney

/s/ Michael R. Hagopian

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17-011118

CERTIFICATE OF SERVICE

I hereby certify that, on the 28 day of January, 2018, I filed and served this document through the electronic filing system on the following parties: John Ennis, Esq

/s/ Michael R. Hagopian

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